

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In the Matter of the Arbitration Between:

JAMES REGO AND ROBERT HILL,

Petitioners,

- against -

RONIN CAPITAL, LLC, JOHN S. STAFFORD
III AND JOHN S. STAFFORD, JR.,

Respondents.
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Civil Action No. 1:2022-cv-1129

**PETITION FOR AN ORDER
CONFIRMING
ARBITRATION AWARD**

NATURE OF THE ACTION

1. Pursuant to Section 9 of the Federal Arbitration Act, 9 U.S.C. § 9, Petitioners James Rego and Robert Hill (“Petitioners” collectively), by and through their attorneys, Warren Law Group, petition this Court for an Order confirming the Arbitration Award (the “Arbitration Award”), dated February 7, 2022, in favor of the Petitioners, made by arbitrators for the Financial Industry Regulatory Authority (the “FINRA Arbitrators”) after evidentiary hearings.

2. The FINRA Arbitrators in the Arbitration Award (the “Award”) determined that: Respondent Ronin Capital LLC is liable for and shall pay to Claimants the sum of \$500,000.00 in compensatory damages; and Respondent Ronin Capital is liable for and shall pay to Claimants interest on the above-stated sum at the rate set by Illinois State for judgment of money damages, from August 27, 2020, until the Award is paid in full.

PARTIES

3. Petitioner James Rego is an individual currently residing in Ridgewood, New Jersey.

4. Petitioner Robert Hill is an individual currently residing in Pinecrest, Florida.

5. Respondent Ronin Capital LLC is a limited liability company organized under the Delaware Limited Liability Company Act. Ronin Capital LLC maintained offices and conducted

business in New York City at 200 Liberty Street, 26th Floor, New York, NY 10282.

JURISDICTION AND VENUE

6. This Court has jurisdiction over this matter pursuant to the Federal Arbitration Act, 9 U.S.C. § 9.

7. Venue is properly laid with the United States District Court for the Southern District of New York pursuant to the Federal Arbitration Act, 9 U.S.C. § 9 and 28 U.S.C. § 1391.

BACKGROUND

8. On August 27, 2020, Petitioners commenced an arbitration against Respondents by filing a Statement of Claim with the Financial Regulatory Authority (“FINRA”) pursuant to FINRA’s Code of Arbitration. On or about September 3, 2020, Petitioners filed an Amended Statement of Claim with FINRA. In the Amended Statement of Claim, Claimants asserted the following causes of action: breach of contract; breach of implied contract of good faith and fair dealing; quantum meruit; violations of the New York Labor Law; violations of the Illinois Wage Payment and Collection Act; unjust enrichment; promissory estoppel; and violations of the Delaware Limited Liability Act. Petitioners also requested that hearings in the case be scheduled in New York, New York since it is the location that is closest to the location where Claimants were employed at the time the dispute arose.

9. On September 3., 2020 Petitioners Rego and Hill submitted executed FINRA Arbitration Submission Agreements with FINRA.

10. On October 9, 2020, Respondents Ronin Capital LLC, John S. Stafford III and John S. Stafford Jr. submitted their Answer to the Amended Statement of Claim and executed FINRA Arbitration Submission Agreements. Pursuant to those Submission Agreements, Respondents agreed, *inter alia*, “to abide by and perform any award(s) rendered pursuant to the Submission Agreement.” Respondents further agreed that “a judgment and any interest due thereon, may be

entered upon such award(s) and, for these purposes, the parties hereby voluntarily consent to submit to the jurisdiction of any court of competent jurisdiction which may properly enter such judgment.”

11. Evidentiary hearings in the matter were originally scheduled to be held in New York, New York. However, the parties subsequently agreed to conduct the evidentiary hearings via ZOOM conference.

12. On December 30, 2021, Petitioners voluntarily withdrew their claims against John Stafford Jr. and submitted jointly with Respondents a Stipulation dismissing John S. Stafford Jr. as a Respondent in the matter.

13. Evidentiary hearings (the “Hearings”) were held before FINRA arbitrators on January 12-14, 2022, and January 20, 2022.

14. On or about February 7, 2022, FINRA arbitrators issued their decision wherein they determined that Respondent Ronin Capital LLC is liable for and shall pay to Claimants the sum of \$500,000.00 in compensatory damages; and that Respondent Ronin Capital LLC is liable for and shall pay to Claimant’s interest on the above-stated sum at the rate set by Illinois State for judgment of money damages, from August 27, 2020, until the Award is paid in full. A true and correct copy of the Arbitration Award is attached hereto as **Exhibit A**.

CLAIM FOR RELIEF
(Confirmation of Arbitration Award)

15. Petitioners repeat and reallege each and every allegation contained in the above paragraphs, inclusive, and incorporate them hereby by reference.

16. Pursuant to 9 U.S.C. § 9, this Petition is brought in a timely manner, within one year of the delivery of the Arbitration Award to Petitioner.

17. The Arbitration Award has not been vacated, modified, or corrected by order of any court

of competent jurisdiction and is still in full force and effect.

18. Pursuant to 9 U.S.C. § 9, Petitioner is entitled to a judgment confirming the Arbitration Award.

WHEREFORE, Petitioner respectfully requests that this Court enter an Order confirming the Arbitration Award dated February 7, 2022.

Dated: New York, New York
February 9, 2022

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